



STATE OF RHODE ISLAND

DIVISION OF PUBLIC UTILITIES & CARRIERS

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June 24, 2021

Ms. Luly Massaro
Clerk
Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02888

Re: Docket No. 5022

Dear Ms. Massaro,

On June 16, 2021, the Commission requested comments from National Grid and the Division as to whether the “current moratorium,” which applies to National Grid electric and gas customers categorized as “protected” under the Commission’s Termination Rules and/or who are on the A-60 rate, should be extended to July 9, 2021 to run in conjunction with Governor McKee’s extension of the State of Rhode Island’s State of Emergency.

As of the date of this correspondence, Rhode Island has one of the highest vaccination rates in the United States, with approximately 56% of its population fully vaccinated. Currently any person 12 and older who lives, works, or attends school in Rhode Island may obtain a Covid-19 vaccine free of charge. Vaccines approved for emergency authorization are widely available and are between 72% and 96% effective depending on the particular vaccine, the type of Covid-19 variant, and the subject age group to whom the vaccine is given.

Additionally, Rhode Island’s unemployment rate in May of 2021 fell to 5.8%, matching the national rate. Professional and business services, manufacturing, health care, and accommodation and food services sectors of the Rhode Island economy all added jobs last month with the State of Rhode Island recovering approximately 64% of the roughly 108,000 jobs lost in March and April of 2020. The State of Rhode Island has now added jobs for five consecutive months.

Along with the wide availability of vaccines and the dramatic improvement of the Rhode Island economy, \$200,000,000 million in federal funding is now available for rental and utility assistance. *See* <https://www.rihousing.com/rentreliefri/>. Funded via the federal Rental Assistance (ERA) Program, Rhode Island renters struggling to cover rent and utility payments due to COVID may qualify for up to 12 months

of emergency assistance. The program can pay for rent and utilities owed back to April 1, 2020 and can also cover up to three months of upcoming rent and utilities. Renters may apply for help with paying for utilities even if they do not need help paying for rent. There is no monthly cap on eligible rent relief and in some instances, an additional three months of assistance may be available.

In sum, the rationale for extending the current moratorium is no longer applicable. Without any basis for the moratorium's imposition, the connection or nexus between its extension and the extension of the Governor's State of Emergency does not exist. Extending the current moratorium to run with the extension of the State of Rhode Island's State of Emergency, therefore, has no logic, and, in the event the State of Emergency is further extended, will only exacerbate the growing arrearages of utility customers.

All that being said, however, the Division recommends that the Commission extend the current moratorium for thirty (30) days to July 25, 2021.¹ The purpose of the additional time is to provide an opportunity to communicate to the low income community the resources that are available to assist in paying their bills. Additionally, communicating a moratorium end date will encourage customers to work with the utility on payment arrangements to avoid disconnections. Absent unforeseen changes in circumstances, the Division does not anticipate supporting any further extensions of the moratorium due to the Division's concerns regarding National Grid's growing accounts receivables. The growth in accounts receivables leads to higher costs and rates that, in turn, makes bills less affordable.

The Division agrees with the Center for Justice's request that no one may be terminated for their arrearages while seeking federal assistance for their arrearages so long as customers remain current on their monthly bills.²

Very truly yours,

Division of Public Utilities and Carriers

/s/ Leo J. Wold

Leo J. Wold
Deputy Chief of Legal Services

¹ It is the Division's understanding that a number of states are ending their Covid-19 Moratoria as of July 1, 2021 but are affording utility customers subject to termination a further grace period from termination through December 31, 2021. *See e.g.*, Connecticut: Moratorium ends May 1, 2021 (with grace period through December 31, 2021 for no utility shut-offs); New Jersey: Moratorium ends July 1, 2021 (with grace period through December 31, 2021 for no utility shut-offs). Other states are simply ending their moratoria as of June 30, 2021 or July 1, 2021. *See e.g.*, Vermont: Moratorium ends June 30, 2021; Massachusetts: Moratorium ends July 1, 2021.

² It's unrealistic to believe that everyone seeking a payment plan will be terminated immediately after July 25, 2021. For those customers requesting a Division review of payment plan options, the Division's review process can take significant time, which ultimately provides additional shutoff protections. Notably, the next Winter Moratorium will provide even further protection for these customers as they will then have had shutoff protection from November, 2019 through May, 2022.